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Meeting Minutes Transmittal/Approval Tri-Party Agreement Milestone Review Meeting EPA Conference Room Richland, Washington December 16, 1992

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From/ Appvl.:	Stévén H. Wisness, RL (A5-19) Harford Project Manager	Date:	1/21/43
Appvl.:	Paul T. Day, EPA (B5-01) Hanford Project Manager	Date:	1/21/92
Appvl.:	David B. Jansen Hanford Project Manager	Date:	1/21/93
Prepared Appvl.:	by Seeh Frank T. Calapristi Westinghouse Hanford Company	Date:	1/21/83

DISTRIBUTION

Austin, BA Bell, ML Bellus, TH Borneman, LE Bryson, DC Calapristi, FT Carter, EK Carter, RP Clark, PK Day, PT Erickson, JK Forehand, GD	WHC WHC WHC RL WHC RL RL EPA RL WHC	B2-35 T6-16 S0-61 B2-35 A5-21 B2-35 R3-35 A5-21 A5-21 B5-01 A5-19 B2-35 B2-35 B2-35	Hennig, JM Jansen, DB Joyce, SM Lundgren, RA Nylander, D Rasmussen, JE Slater, HW Thompson, KM Thompson, RR Tilden, HT Wisness, SH Yerxa, JK EDMC	RL A5-21 PV-11 01ympia WHC H1-61 PNL P7-41 ECO Kennewick RL A5-15 PNL P7-40 RL A5-15 WHC 14-96 PNL P7-68 RL A5-15 WHC H4-22 HG-08
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TPA Milestone Review Meeting Minutes Transmittal/Approval December 16, 1992 (sheet 2 of 4)

1. MILESTONE M-24-00, GROUNDWATER WELLS

The information was presented by D. Bryson (Attachment 1). Under Special Topics, it was noted the Change Request was signed and approved by all parties. There were no issues or action items identified.

2. MILESTONE M-11-00, LAB HOT CELL EXPANSION

The information was presented by Paul Carter (Attachment 2) and supplemented by photos of the Hot Cell work performed by a sub-contractor. Under the Budget Assessment, RL reported the FY 1992 annual budget of \$31.5M shown in the presentation includes the HVAC upgrade budget with the Hot Cell Expansion.

It was emphasized the \$2.9M congressional reprogramming will be required by February 1993 to meet the current schedule. There were no action items identified in the presentation.

3. MILESTONE M-14-00, LOW-LEVEL LAB

The information was presented by Paul Carter (Attachment 3) and supplemented by photos of the work in progress.

Regarding the Dispute Resolution settlement and associated change request, RL reported they are in contact with HQ to obtain their concurrence. It was noted by RL that the RFP contracts include only the ER samples since this work is planned to go to ERMC (EM-40). The WM samples may be handled by another contract under WHC (EM-30). DOE did not know the exact mechanism by which WM samples would be handled, but could answer this question by February 1993.

EPA expressed concern that restriction to the ER samples is inconsistent with the original scope of M-14-00 and a potential problem exists if RL later requires capacity in the new lab to process WM samples at the expense of ER samples. RL responded that the sample capacity included in the original WSCF Conceptual Design Report as required by the M-14 milestone will be verified and compared to the current scope of the proposed procurement. After discussion of the concerns expressed by RL and EPA, RL suggested a meeting in the January/February time frame, with EPA and Ecology, to discuss Hanford's plan to assure lab capacity and turnaround time to process both ER and WM samples.

EPA and Ecology expressed <u>concern</u> with N-Springs ERA in that the EE/CA slipped from March to July 30 with no start of remediation until FY 1995. The regulators' understanding of the original SEC Agreement was that physical implementation of the ERA would begin in FY 1994. The DOE position is that the commitment was to "seek FY 1994 funding" to support an ERA. If FY 1993 funding is required to move the ERA action up, such expectations are beyond the SEC agreement. RL responded that DOE may not have the funding to begin activities in FY 1993. Ecology is concerned about impact to negotiations of other work in N-Area which was centered around planned N-Spring ERA work proposed for FY 1993 and remediation activity in FY 1994.

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TPA Milestone Review Meeting Minutes Transmittal/Approval December 16, 1992 (sheet 3 of 4)

Action: RL to provide written explanation on N-Springs ERA schedule slip and the lack of FY 1993 funding and the status of FY 1994 funding.

Resp: J. Erickson

Due: January 29, 1993

EPA also questioned the October 1995 date to have commercial sector labs in place. EPA believes this date could have been accelerated since the RFP process was started several months early, as RL is not exercising the WSCF expansion option. RL emphasized the October 1995 date is a success-oriented schedule and will be difficult to meet. Regardless, it is the position of RL, that DOE proactive actions to expedite compliance work should not result in moving up enforceable Tri-Party Agreement milestones.

4. MILESTONE M-18-00, WRAP I

The information was presented by J. Augustenborg (Attachment 4)

There were no issues or actions identified.

5. MILESTONE M-19-00, WRAP II

The information was presented by J. Augustenborg (Attachment 5).

Under Accomplishments, it was noted the Change Request submitted to Ecology/EPA has a 45 day period for public comment before sign-off.

Under Milestone Assessment, RL reported a potential \$3.0M shortage in FY 1993 and the funds will have to be located by April 1993 to avoid a schedule slip. However, RL is optimistic at this time, they will obtain the necessary funds.

There were no action items.

6. MILESTONE M-26-01, LDR REPORT

The information was presented by J. Augustenborg (Attachment 6)

EPA reported the Federal Facility Compliance Act appeared to be based on the M-26 milestone requirements and complemented Hanford for the pro-active effort.

7. MILESTONE M-20-00, PART B AND CLOSURE PLANS

The information was presented by C. E. Clark (Attachment 7)

Under Planned Actions, RL reported Ecology's delay in responding to the Part B NOD's and Closure Plans is affecting work planning and is reflected in the FY 1993 cost underrun.

Action: RL to write letter to Ecology and request a meeting to develop an Ecology schedule to respond to Part B NOD's and Closure Plans.

Resp: C. E. Clark Due: January 20, 1993

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TPA Milestone Review Meeting Minutes Transmittal/Approval December 16, 1992 (sheet 4 of 4)

Under Special Topics, RL reported they will be submitting a change request to Ecology for interim milestones M-20-42, M-20-43 and M-20-44 to extend the schedule by one year.

RL informed EPA and Ecology they are in the process of writing a letter to respond to N. Pierce's letter to PNL and L. Bray's letter to Chuck Clarke concerning R&D permitting activities as discussed in the December 14, 1992 SEC meeting. The letter is expected to be issued by December 24, 1992.

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AGENDA
TPA MILESTONE MANAGEMENT MEETING

Wednesday, December 16, 1992

EPA CONFERENCE ROOM MEDICAL DENTAL CENTER

TIME	MILESTONE	TITLE	RL DIVISION DIRECTOR	LEVEL 2/3 MGR.	<u>PRESENTER</u>
9:00 am	M-24-00	Groundwater Wells	J. M. Hennig	R. D. Wojtasek	M. J. Furman
9:20 am	M-11-00	Lab Hot Cell Expansion	J. M. Hennig	J. R. Kelly	R. P. Carter
	M-14-00	Low Level Lab	J. M. Hennig	C. R. Stroup	R. P. Carter
10:05 am		BREAK			
10:15 am	M-18-00	WRAP I	J. M. Hennig	R. J. Roberts	J. Augustenborg
	M-19-00	WRAP II	J. M. Hennig	R. J. Roberts	J. Augustenborg
·	M-26-01	LDR Plan	J. M. Hennig	C. J. Geier	J. Augustenborg
11:00 am	M-20-00	Part B and Closure Plans	J. D. Bauer	C. J. Geier	C. E. Clark
11:30 am		ADJOURN			

<u>ATTENDEES</u>

TPA MILESTONE MANAGEMENT REVIEW

DECEMBER 16, 1992

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EPA CONFERENCE ROOM MEDICAL DENTAL CENTER

NAME	ORGANIZATION	MAILSTOP
F.T. CALAFRISTI	WHC/TFA	B2-35
		1
RRThompson	NHC/Enr. SIM	L4-94
GD FOREHAND	WHC/TPA	B7-35
EK CARTER	WHC/Projects	R3-35
DAVE WYLANDER	Enlogy	Kenn
June M. Hennig	DUE - RL	A5-21
R. PAUL CARTER	DOE-RL	15-71
B.A. Aussin	WHC TPH	B2-35
S.H. Wisness	DOE -RL	A 5-15
Paul Day	EPH	B5-01
Steven Myce	WHC-HASM	H1-61
Thomas H. Bellus	WHC-PALS	50-61
Acting for Marshabell		

ATTENDEES

TPA MILESTONE MANAGEMENT REVIEW

DECEMBER 16, 1992

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EPA CONFERENCE ROOM MEDICAL DENTAL CENTER

NAME	ORGANIZATION	MAILSTOP
LEBraman	WHC- TOA	<u> </u>
_	DOS - TPA	A5-15
JON YERXA	,	
Jin Rasmussen	DOE-RPB	45 -15
Harold Tilden	PNC - Laboratory Safety	P7-68
HVaijne Slater	PAL-WIC	11-17-6/2
-y v scoppe i general	7.00	
How to Land taken	T. Y. T.	<u> </u>
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D. C. Bryson

Liquid Waste Branch

December 16, 1992

Milestone Description

o M-24-00 (As Amended)

Install RCRA groundwater monitoring wells at the rate of 29 in CY 1989, 30 in CY 1990, and up to 50 per year thereafter as specified by agreed interim milestones until all land disposal units and single-shell tanks are determined to have RCRA compliant monitoring systems.

o DELIVERABLE(S)

Installation of groundwater wells shall mean that wells have been drilled, adequately sealed, and screened over no more than 15 feet of the aquifer unless otherwise approved by Ecology, that all pumps and associated sampling equipment have been installed, and that such wells have been developed sufficiently to provide satisfactory samples for all parameters to be analyzed. Ecology determines that all such groundwater monitoring systems meet the requirements of WAC-173-303-645.

o BASELINE SCHEDULE

Install wells annually beginning in CY 1989.

Accomplishments (September-November 1992)

- Drilled 6, backpulled 5, and made sample ready 9 more of the CY 1992 wells.
- Completed 6 more interim milestones encompassing 11 of the wells in this year's program. Three were in September more than 3 months early and the other 3 in November.
- Change request formally adopting "up to 50" wells per year signed by Ecology and transmitted to EPA regional headquarters for final signature.
- Three interim milestones for 7 wells to be drilled in CY 1993 were approved.

Install RCRA Groundwater Wells

Milestone M-24-00

Planned Actions (Next Six Months)

- Finish the one remaining well backpulling, development, and pump installation for the CY 1992 program.
- Begin drilling wells for CY 1993.

MILESTONE ASSESSMENT - Schedule

- LLBG RCRA (10) (M-24-19) COMPLETED JULY 29
- O Grout (2) (M-24-20) COMPLETED SEPTEMBER 2
- 1301-N Crib (2) (M-24-21) COMPLETED JULY 13
- o 1324-N Pond (1) (M-24-22) COMPLETED NOVEMBER 18
- S-10 Pond and Ditch (1) (M-24-23) Drilled to total depth on Nov. 20; backpulling in progress
- O B-63 Trench (2) (M-24-24) COMPLETED JULY 15
- A-29 Ditch (2) (M-24-25) COMPLETED SEPTEMBER 29
- NRDWL (2) (M-24-26) COMPLETED NOVEMBER 17
- O B-Pond (2) (M-24-27) COMPLETED NOVEMBER 12
- O SSTs (2) (M-24-28) COMPLETED SEPTEMBER 4

MILESTONE ASSESSMENT (Cont'd)

Well Summary (As of November 30, 1992)

26 Identified Wells

	<u>Complete</u>	Remaining	<u>In Progress</u>
Wells Drilled	26	0	O
Wells Backpulled	25	1	1
Wells Sample Ready	25	1	0

MILESTONE ASSESSMENT (Cont'd)

Technical Scope

- Drilling started in December 1991
- Interim Milestones Approved 26 Wells
- All 26 of the wells drilled to depth.
- o 25 wells sample ready.
- o 9 of 10 interim milestones for this year are complete.

MILESTONE ASSESSMENT (Cont'd)

Budget and Actual Cost (\$ in millions)

Cumulative			· · · · · · · · · · · · · · · · · · ·							
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
FYTD Budget	0.1	0.4								
FYTD Cost	0.1	0.6								
Spending Variance	-	0.2								

Variance Explanation: Reflects activities to finish 1992 wells originally budgeted in FY 1992

Install RCRA Groundwater Wells

Milestone M-24-00

SPECIAL TOPICS

Change Requests

Change Number	<u>Class</u>	<u>Milestone</u>	<u>Description</u>
M-24-91-6	1	M-24-00	Establish agreed interim milestones as the annual requirement. Wilestone "up to" 50 wells per year. Up to 4 "TBD" wells may be identified by Ecology (M-24-29).

Signed by Ecology. Sent to EPA regional headquarters for signature.

M-24-92-1	2	M-24-30 M-24-31	Establish interim milestones for wells to be drilled in CY 1993 at three locations; total of seven
		M-24-32	wells.
Approved in O	otobor		

Complete Construction and Initiate Operations of Expanded Laboratory Hot Cells for High-Level Radioactive Mixed Waste

MILESTONE M-11-00

Paul Carter

December 16, 1992

MILESTONE DESCRIPTION

• M-11-00

Complete construction and initiate operations of expanded laboratory hot cells for high-level radioactive mixed waste.

DELIVERABLE(S)

Complete Conceptual Design for hot cell expansion - June 1989

Complete Definitive Design for hot cell expansion - March 1992

BASELINE SCHEDULE - Complete construction and initiate operations - June 1994

ACCOMPLISHMENTS (Last three months)

- Construction slightly ahead of schedule. All foundations and stem walls poured. Buried duct and piping installed. Backfill essentially complete.
- Started off-site fabrication of building tilt-up concrete walls.
- Off-site fabrication of hot cell continues on schedule.
- Finalized contracts on major equipment (shielding windows and manipulators).

PLANNED ACTIONS (Next six months)

- Continue construction. Pour hot cell foundation and building floor slab. Erect building.
- Complete fabrication of hot cell. Ship hot cell to Hanford and begin installation.
- Receive manipulators and windows.

MILESTONE ASSESSMENT

Schedule

- Conceptual Design completed June 1989 (Interim milestone M-11-01)
- Definitive Design completed February 1992 (Interim milestone M-11-02, March 1992)
- Construction Schedule
 - Awarded construction contract June 1992
 - Began construction July 1992
 - Complete construction December 1993
- Complete construction for Hot Cells Expansion June 1993 (Target Milestone M-11-00-T1)
 - Change Request will be provided
- Initiate Operations June 1994 (Major Milestone M-11-00)

MILESTONE ASSESSMENT (cont'd)

Technical Scope

No changes in scope

MILESTONE ASSESSMENT (cont'd)

Budget vs. Cost (\$ in Millions)

Fiscal Year to Date	Oct	Nov	Dec	Jan	Feb	Mar	3 rd Otr.	4 th Otr.
Budget	.827	1.642	2.502	3.372	3.996	5.159	19.290	31.530
Cost	.580	1.475						
Spending Variance	.247	.167						

SPECIAL TOPICS

- Key interface Project W-001 (222-S Laboratory HVAC and Electrical Upgrade) has \$2.9 million shortfall for construction.
- Reprogramming request for additional funding has been resubmitted to Congress.
- New date for funding has been moved to mid February 1993 due to savings on Fixed Price Contract and procurement contracts.
- Fixed Price Contract awarded October 1992.
- Last procurement contract to be awarded by end of December 1992.
- All long-lead equipment to be received by end of April 1993.

Complete Construction and Initiate

Operations of A Low-Level

Mixed Waste Laboratory

Milestone M-14-00

R. P. Carter

December 16, 1992

Milestone Description

• M-14-00

Complete construction and initiate operations of a low-level mixed waste laboratory (January 1992).

- Deliverables (s) Facility accepted by operations contractor and RL for facility start-up.
- Baseline Schedule Complete construction and initiate operations January 1992. This milestone in dispute resolution. Currently working toward April 1994 WSCF start-up.

Accomplishments (last three months)

- Laboratory Modules are on temporary foundations at contractors site. Installation of equipment and testing to be completed before shipment (plan shipment in January).
- Contract for auxiliary buildings awarded.
- Contract for assembling and testing of modules at site awarded.
- WSCF construction
 - Structural steel for roof installed
 - Pre-cast wall panels for first floor set into place
 - Analytical Laboratory foundation complete.
- Tracking commercial laboratory turnaround times per one year trial period and reporting results quarterly.

Planned Actions (next six months)

- Begin shipment of modules to site.
- Start site assembly of modules.
- Continue tracking commercial laboratories turnaround times per one year trial period.
- Start construction of auxiliary structures.

Milestone Assessment (Project to Date)

Budget Performance:

THOUSANDS OF \$	SEPT	ОСТ	NOV
BUDGET	13,920	14,034	14,748
COST	9,200	9,881	11,421
VARIANCE	4,720	4,153	3,327

VARIANCE EXPLANATION: Contact billings delayed planned budget starting February 1992.

Special Topics

• Finalize dispute resolution on M-14-00.

Waste Receiving and Processing Module 1 Milestone M-18-00

J. M. Augustenborg

Waste Management Division

December 16, 1992

Milestone Description

- Complete Waste Receiving and Processing (WRAP) Module 1 construction and initiate operations. The WRAP Module 1 is required to sort and repackage wastes that are planned to be retrieved from retrievable storage units. Much of the waste currently stored in the retrievable storage units is anticipated to be radioactive mixed waste. Some of the radioactive waste stored on the pads is known to contain extremely hazardous waste as well as federally land-banned waste.
- The completion of construction and the initiation of Operational Test Procedures (OTP's) and start-up will constitute the deliverable
- Completion of M-18-00 is scheduled for March 1997.

Accomplishments

- Received DOE-HQ approval of NEPA C2 Analysis
- Supercompactor application review completed

Planned Actions

- Continue Title II Design activities
- Reviewing alternative means of sampling and analysis

Milestone Assessment

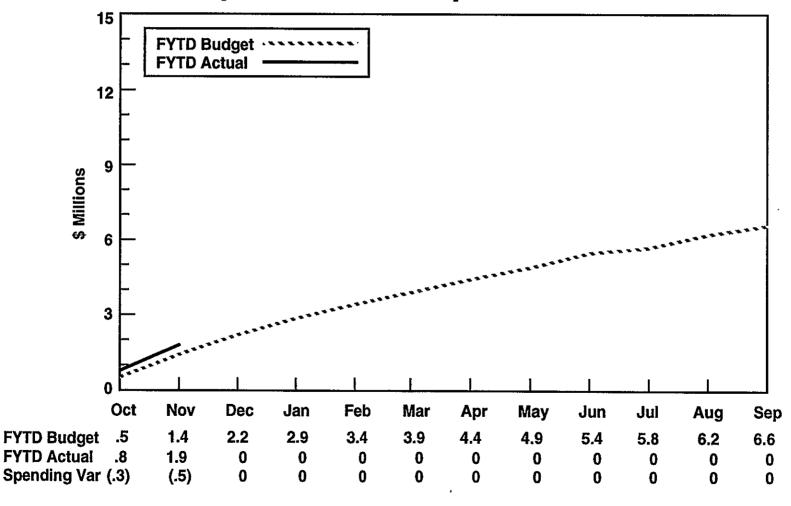
Schedule

Reviewing schedule for impacts to start of construction

United Engineers and Constructors one month behind in Title 2 Design

Milestone M-18 FY 1993

Description: Initiate Operations of WRAP 1



Waste Receiving and Processing Module 2

Milestone M-19-00

J. M. Augustenborg

Waste Management Division

December 16, 1992

Milestone Description

Complete Waste Receiving and Processing (WRAP) Module 2
 construction and initiate operations. The WRAP Module 2 will include
 waste treatment capabilities to minimize land disposal of low-level
 radioactive waste and radioactive mixed waste. The September 1999
 completion date of WRAP Module 2 is critical to achieving compliance
 for the management of wastes that are prohibited from land disposal
 and extended storage.

Proposed WRAP 2A

The WRAP Module 2A will include waste treatment capabilities for low-level radioactive waste and radioactive mixed waste.
WRAP 2A is critical to achieving compliance for the management of wastes that are restricted from land disposal and extended storage.
Start-up is proposed for September 1999

Proposed WRAP 2B

The WRAP 2B will characterize, treat, and repackage as required to permit permanent disposal of newly generated TRU and suspect TRU in containers too large or heavy to be handled in WRAP Module 1 and all RH-TRU waste start-up is TBD

Accomplishments

Proposed WRAP 2A

- Formally submitted Change Request M-19-91-01 to EPA/Ecology
- Responded to Ecology comments on Change Request
- Conducted tour of WIPP to familiarize Ecology reviewers with Waste Acceptance issues

Proposed WRAP 2B

Formally submitted Change Request M-19-91-01 to EPA/Ecology

Responded to Ecology comments on Change Request

Planned Actions

Proposed WRAP 2A

- Continue Advanced Conceptual Design Studies
- Begin development for Part B Permit Application (32 month cycle)
- Initiate development of Preliminary Safety Analysis Report (PSAR)
- Respond to Ecology's November Change Request comments
- Begin planning CR public comment period/hearings

Proposed WRAP 2B

- Continue to evaluate uncertainties associated with WIPP Waste Acceptance Criteria
- Develop Engineering studies to evaluate technical options
- Respond to Ecology's November Change Request comments
- Begin planning CR public period/hearings

Milestone Assessment

Proposed WRAP 2A

Schedule - on Proposed target

- WRAP 2A is a FY 1994
 Line Item
- Funding short falls in FY93

Proposed WRAP 2B

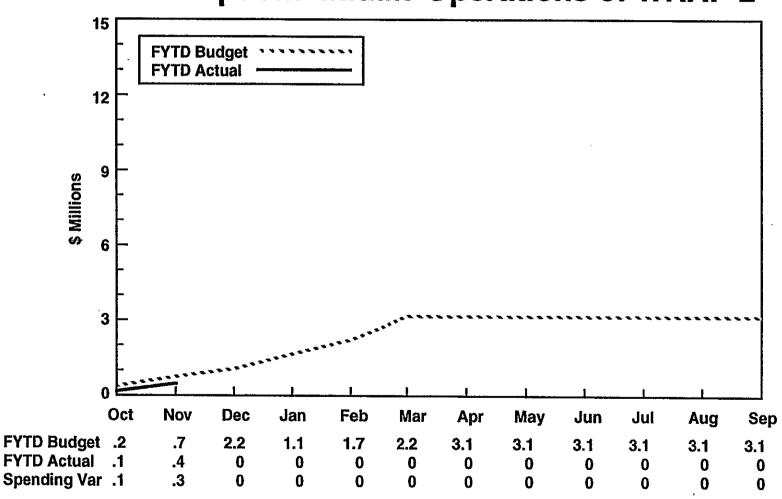
Schedule - on Proposed schedule, engineering study by March 1993

Issues - WIPP Acceptance criteria

Earliest WRAP 2B is a FY 1996 Line Item

Milestone M-19 FY 1993

Description: Initiate Operations of WRAP 2



LAND DISPOSAL RESTRICTIONS ANNUAL REPORT

M-26-01

WASTE MANAGEMENT DIVISION

J. M. Augustenborg December 16, 1992

Milestone Description

M-26-01 Submit an annual Hanford Land Disposal Restrictions

(LDR) Report in accordance with the LDR Plan to cover

the period from April 1 through March 31.

Deliverables Submit "1993 Report on Hanford Land Disposal

Restrictions for Mixed Wastes" to EPA and Ecology.

Schedule Status reports submitted annually by April 30.

Accomplishments

• In October 1992, distributed letter with attachment listing changes to 1992 LDR Report to all document holders. These changes are a result of EPA comments and will be incorporated into the 1993 LDR Report.

Planned Actions

 Submittal of 1993 report to EPA and Ecology by April 30, 1993.

Milestone Assessment - schedule and technical

- Preparation of 1993 updated LDR status report was initiated in November 1992 and is on schedule.
- Budget versus cost (\$ in 000's)

_	FY 92 TOTAL	FY 93 Oct	Nov	Dec	TOTAL
- FYTD Budget:	137.6	7.5	17.7	25.4	147.1
- FYTD Cost:	108.3	5.3	16.4		
- Spending Variance:	29.3	2.2	1.3		

- Variance Explanation: LDR Report preparation was underrun in FY 92 due to not requiring consulting services.

PERMIT AND CLOSURE PLANS

Milestone M-20-00

C. E. Clark

Environmental Permits
U.S. Department of Energy
Richland Field Office

December 16, 1992

MILESTONE DESCRIPTION

M-20-00

Submit Part B Permit Applications or closure plans for all RCRA TSD Units (5-96)

Deliverable(s)

Complete individual TSD unit submittals in accordance with Appendix D Work schedules (~10 submittals per year)

ACCOMPLISHMENTS (last three months)

Closure Plans

- Submitted closure plans for the following units in November 1992:
 - Hanford Patrol Academy Demolition Site (M-20-25)
 - Ashpit Demolition Site (M-20-26)
 - Hexone Storage and Treatment Facility (M-20-27)
 - E-8 Borrow Pit Demolition Site (M-20-28)
- Submitted NOD response tables for the following units:
 - 2101-M Pond (11/18/92)
 - 105-DR Large Sodium Fire Facility (11/30/92)

ACCOMPLISHMENTS (last three months) (Cont'd)

Part Bs

- Submitted Revision 1 of the Request for Exemption From Lined Trench Requirements and from Land Disposal Restrictions for Residual Liquid at 218-E-12B Burial Ground Trench 94 (10-12-92)
- Submitted an NOD response table for the RMW Storage Facility Part B Permit Application (10/9/92)
- Submitted a TPA Change Request for deferral of the Part B Permit Application submittal for the Maintenance and Storage Facility (M-20-29)
- Submitted a TPA Change Request for removal of the milestone for a Part B Permit Application for the 303-M Oxide Facility (M-20-30)
- Submitted a 305-B page change package to Ecology/EPA (11/2/92)

PLANNED ACTIONS (next six months)

Unit-Specific Closure Plans

- Respond to closure plan NODs when received from Ecology for the following units:
 - Simulated High Level Waste Slurry Treatment/ Storage Facility (Submitted 6/29/90)
 - Nonradioactive Dangerous Waste Landfill (Submitted: 08/31/90) (M-20-07)
 - 300 Area Waste Acid Treatment System (Submitted: 11/26/90)(M-20-10)
 - 4843 Alkali Metal Storage Facility (Submitted: 06/28/91) (M-20-14)
 - Hanford Patrol Academy Demolition Site (M-20-25)
 - Ashpit Demolition Site (M-20-26)
 - Hexone Storage and Treatment Facility (M-20-27)
 - E-8 Borrow Pit Demolition Site (M-20-28)
- Preparing to submit the 100-D Ponds Closure Plan in February 1993 (M-20-40)

PLANNED ACTIONS (next six months) (Cont'd)

Unit-Specific Part B's

- Submittal of final page changes for the Waste Water Pilot Plant RD&D Permit Application
- Respond to Part B NODs received from Ecology for the 222-S Laboratory Complex (Received: 10/31/91)(M-20-05)
- Respond to Part B NODs when received from Ecology for the following units:
 - Double-Shell Tank System (Submitted: 06/30/91) (M-20-16)
 - 242-A Evaporator (Submitted: 06/30/91)(M-20-17)
 - Liquid Effluent Retention Facility (Submitted: 06/30/91)(M-20-47)
 - 325/3100 Hazardous Waste Treatment Unit (Submitted: 06/30/92)(M-20-20)
 - TRUSAF (Submitted: 06/30/92)(M-20-23)
 - Grout, Revision 2 (Submitted 07/26/92)(No TPA Milestone Number)
 - Low-Level Burial Grounds (Submitted 12/30/89) (M-20-06)

MILESTONE ASSESSMENT

Budget vs. Cost (\$ in 000's)

FYTD Budget*	Oct 587	Nov 1486	Dec 2225	Jan 3067	Feb 3824	Mar 4558	Apr 5367	May 6295	Jun 7115	Jul 7867	Aug 8726	Sep 9253
FYTD Cost	295	943										
Variance**	+292	+543										

- Not all M-20 Milestone funding has been identified
- ** Variance Explanation: M-20 is currently underspent due to continued delays in receipt of comments and NOD responses resulting in less than planned support for follow-on revisions for Closure Plans and Part B Permit applications

NOTE: Costs shown are only those accumulated by Westinghouse Hanford Company.

SPECIAL TOPICS

Draft Hanford Facility Permit

- Awaiting receipt of Ecology action item (provide a schedule for finalization of the permit)
 - Needed to support EPA/Ecology/RL action planning for review and issuance of permit

Submittal of Part B Applications/Closure Plans After May 1996

- Denial of TBG petitions
- Management of regulators and contractor workloads
- Change of TSD unit missions
- Options
 - Extend end date for M-20-00 to 2018
 - Create a new major milestone
 - Revise M-20-00 case-by-case
 - Other options

PNL RCRA Part-B Permits

<u>Unit</u>	TPA Milestone/Due Date			
Thermal Treatment	M-20-42	12-31-93		
Physical/Chemical Treatment	M-20-43	12-31-94		
Biological Treatment	M-20-44	12-31-95		

Thermal Treatment M-20-42*

- **■** Contains three complex technologies:
 - High Temperature Melter Section
 - In-Situ Vitrification Test Section
 - In-Situ Heating Test Section
- A TPA change control form is being processed requesting that TPA Milestone M-20-42 be moved to December 31, 1994

*Due December 31, 1993

Thermal Treatment M-20-42 (Cont'd)

- Potential addition of fourth technology:
 - B-Cell Radioactive Mixed Waste Treatment Section
- Closure-related Issues

Permitting options

- Part B Permit (current plan)
- RD&D
- **■** Treatability Study Exemption
- Variance
- Hybrid Approach

Suggested action

Ecology/DOE-RL/PNL meet to exchange ideas for streamlining permitting effort:

- **DOE-RL/PNL** will present concerns
- **■** Ecology to provide guidance

Action to date

- Letter from Rep. Lane Bray to Chuck Clarke raising issues on applicability of regulatory permitting processes to research and development activities
- Letter from Narda Pierce of Ecology to Director, PNL suggesting joint effort to discuss R&D permitting concerns
- Letter from Dr. William Wiley to Narda Pierce indicating PNL's willingness to participate in review of permitting of waste treatment technology
- DOE-RL is preparing a letter indicating interest in participation and suggesting a meeting in late January